

**VERONICA DEAVER
POST OFFICE BOX 2248
MCKINNEY, TEXAS 75070
STATE BAR NO. 24007096
TEL: (972) 562-8863
FAX: (972) 529-7002
ATTORNEY FOR DEBTORS**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE

Case No: 15-40892

Lawrence Edward Creed

Chapter 7

NOTICE

NO HEARING WILL BE CONDUCTED HEREON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PART FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

**MOTION BY DEBTOR TO CONVERT FROM CHAPTER 7 CASE
TO CASE UNDER CHAPTER 13**

TO THE HONORABLE COURT:

COMES NOW, Lawrence Edward Creed, Debtor in the above styled and numbered bankruptcy case and files this their Motion to Convert From Chapter 7 Case to Case under Chapter 13, of the Bankruptcy Code.

1. The bankruptcy case was commenced by a petition filed by the debtor(s) under

Chapter 7 of Title 11, United States Code on the 15th of May, 2015.

2. The debtor(s) hereby file(s) this conversion under 11 U.S.C. Sec. 706(a), in order to convert this Chapter 7 case to a case under Chapter 13 of the Bankruptcy Code.

3. The debtor(s) is in the process of completing tax returns for the past 4 years, owes taxes for each of those 4 years and it is necessary for the debtor to reorganize his debt under a Chapter 13 case.

4. Filed herewith are schedules and statements appropriate for a Chapter 7 case and a matrix address list which includes all creditors including those creditors scheduled or filing claims in the Chapter 13 case.

5. This case has not been converted under 11 USC § 1307, 11 USC § 1208, or 11 USC § 1112.

WHEREFORE, debtor(s) request(s) for relief in accordance with Chapter 13 of the Bankruptcy Code, 11 USC § 706(a).

Respectfully submitted,

/s/Veronica Deaver

VERONICA DEAVER
POST OFFICE BOX 2248
MCKINNEY, TEXAS 75070
STATE BAR NO. 24007096
TEL: (972) 562-8863
FAX: (972) 529-7002
ATTORNEY FOR DEBTORS

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE)	Case No: 15-40892
)	
Lawrence Edward Creed)	
)	
)	
)	
)	Chapter 7
)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Debtors' Motion to Convert From Chapter 7 Case to Case under Chapter 13 has been served via electronic means through the Court's CM/ECF system or by pre-paid regular first class U.S. Mail on this the 3rd day of September, 2015, compliance with the Federal and Local Rules of Bankruptcy Procedure to the following:

All Parties listed on the Attached Court Mailing Matrix

/s/Veronica Deaver
Veronica Deaver

Label Matrix for local noticing
0540-4
Case 15-40892
Eastern District of Texas
Sherman
Wed Sep 2 17:57:57 CDT 2015

AFNIT, Inc.
PO Box 3427
Bloomington IL 61702-3427

BRADLEY MULLINS
c/o Peter J. Bennett, PC
202 Travis St., Ste. 207
Houston, Texas 77002-1726

(p)BLALACK WILLIAMS P C
4851 LBJ FREEWAY
SUITE 750
DALLAS TX 75244-6012

COLLIN COUNTY
GAY, MCCALL ISAACKS ET., AL
777 E. 15TH ST.
PLANO, TX 75074-5799

Chase Card
P.O. Box 15298
Wilmington, DE 19850-5298

Conns Credit Corp
Box 2358
Beaumont, TX 77704-2358

Covergent
800 SW 39TH St.
Renton WA 98057-4975

Lawrence Edward Creed
1917 Fountain Spray
Wylie, TX 75098-8051

Veronica Deaver
P.O. Box 2248
McKinney, TX 75070-8167

Fandistg
Po Box 22717
Rochester, NY 14692-2717

GEGRB/Care Credit
Attn: bankruptcy
PO Box 103104
Roswell, GA 30076-9104

Chris Gerstner
dba Resolute Services
3000 Custer Road #270-138
Plano, TX 75075-4422

JAMIE MCFERON
c/o Peter J. Bennett, PC
202 Travis St., Ste. 207
Houston, Texas 77002-1726

Linebarger Goggan Blair & Sampson LLP
1300 Main, Suite 425
Houston TX 77002-6803

David McCall
Gay, McCall, Isaacks, et al
777 East 15th Street
Plano, TX 75074-5799

McCreary Veselka, Bragg & Allen PC
PO Box 1310
Round Rock TX 78680-1310

Christopher Moser
2001 Bryan Street, Suite 1800
Dallas, TX 75201-3070

Peter Bennett
202 Travis St.
Houston TX 77002-1726

Quilling, Selander, Lownds, Winslett & Moser
2001 Bryan Street, Suite 1800
Dallas, TX 75201-3070

SunTrust Bank
Attn: Support Services
P.O. Box 85092
Richmond, VA 23286-0001

Suntrust Bk Tampa Bay
Attn:Bankruptcy Dept
PO Box 85092 MC VA-WMRK-7952
Richmond, VA 23285-5092

Synchrony Bank
c/o Recovery Management Systems Corp
25 SE 2nd Ave Suite 1120
Miami FL 33131-1605

Texans Credit Union
c/o Blalack & Williams, P.C.
4851 LBJ Freeway, Suite 750
Dallas, TX 75244-6012

Texans Credit Union
f/k/a Texins Credit Union
P.O. Box 853912
Richardson, TX 75085-3912

Texas Dept. of Public Safety
Surcharge Processing
PO Box 16733
Austin TX 78761-6733

U.S. Attorney General
Department of Justice
Main Justice Building
10th & Constitution Ave., NW
Washington, DC 20530-0001

US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702-7231

Kelly B. Williamson
Law Office of Kelly B. Williamson
P.O. Box 207
Miami, TX 79059-0207

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Blalack & Williams
4851 LBJ Freeway Suite 750
Dallas TX 75244

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Chris Gertnser
DBA Resolute Services
3000 Custer Rd. #270-138
P75075lano TX

(d)Christopher Moser
2001 Bryan Street, Suite 1800
Dallas, TX 75201-3070

End of Label Matrix	
Mailable recipients	28
Bypassed recipients	2
Total	30